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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SCHUTTE BAGCLOSURES INC.

Plaintiff,

v.

KWIK LOK CORPORATION

Defendant.

Civil Action No. 12-CV-5541 (JGK)

STIPULATED REQUEST AND
[PROPOSED] ORDER FOR EXTENSION
OF DEADLINES CONTAINED IN THE
COURT'S SCHEDULING ORDER
DATED NOVEMBER 8, 2012 (DE 14)

Plaintiff Schutte Bagclosures Inc. ("Plaintiff"), by and through its undersigned attorneys, and defendant Kwik Lok Corporation ("Defendant"), by and through its undersigned attorneys, do hereby stipulate to request to extend the deadlines contained in the Court's Scheduling Order dated November 8, 2012 (DE 14), as follows:

If the Plaintiff does not file an amended complaint, the Plaintiff's response to the Defendant's Motion to Dismiss dated October 5, 2012 (DE 7) should be filed by **December 11, 2012**. The Defendant's reply, if any, should be filed by **December 21, 2012**.

If the Plaintiff files an amended complaint on or before **December 11, 2012**, Defendant's Motion to Dismiss dated October 5, 2012 (DE 7) is denied without prejudice as moot and the time to move to dismiss or answer the amended complaint is extended to fourteen days after service of the amended complaint.

If Defendant files a renewed motion to dismiss, the Plaintiff's response is due fourteen days after service of the motion. The Defendant's reply, if any, is due ten days after service of the response.

Two prior requests have been made for extensions of time related to the Court's Scheduling Order dated November 8, 2012. Specifically, the parties previously requested extension of the deadlines contained in the Court Scheduling Orders dated September 27, 2012 and October 18, 2012, respectively.

The deadline for Plaintiff's response to Defendant's Motion to Dismiss (or its filing of an amended complaint) was October 22, 2012, which was extended by this Court's order to October 29, 2012 (DE 11), which was extended to November 5, 2012 by Chief U.S.D.J. Preska's October 31, 2012 Order regarding the Extension of Certain Deadlines in Civil Cases as a Result of Hurricane Sandy and Court Closure, which was extended to November 27, 2012 by this Court's Order (DE 14). This extension is not being entered for the purpose of delay, but rather due to provide the parties an opportunity to continue their settlement discussions.

Dated: New York, New York
November 26, 2012

Respectfully submitted,

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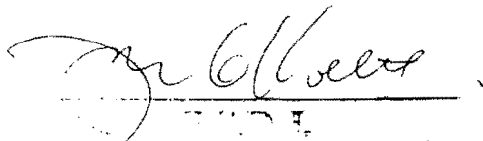
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SO ORDERED:


11/30/12